

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE DIDI GLOBAL INC. SECURITIES  
LITIGATION

Master Docket 1:21-cv-05807-LAK

This Document Relates to: All Actions

**JOINT STIPULATION AND [PROPOSED]  
ORDER REGARDING MOTION TO SEAL**

WHEREAS, on April 10, 2025, the Court entered an order requiring Plaintiffs to file by May 1, 2025, a motion to keep under seal the exhibits attached to their Reply in Support of Class Certification by May 1, 2025 (“Plaintiffs’ Reply,” Dkt. No. 349);

WHEREAS, under the Confidentiality Stipulation and Protective Order (“Protective Order,” Dkt. No. 190), the party that produced materials designated “For Attorneys’ Eyes Only” can file within three days from the filing date of so designated material a letter explaining the reasons for keeping that material sealed (*id.* ¶ 14);

WHEREAS, Underwriter Defendant Goldman Sachs (Asia) L.L.C. produced materials designated “For Attorneys’ Eyes Only” under the Protective Order and filed under seal as exhibits to Plaintiffs’ Reply (Dkt. No. 348);

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and among the undersigned counsel for the signatory parties, subject to the Court’s approval, that

1. The Underwriter Defendants will submit on May 1, 2025, a letter in support of Plaintiffs’ motion to seal explaining the reasons for keeping the exhibits attached to Plaintiffs’ Reply sealed.

IT IS SO ORDERED.

DATED: \_\_\_\_\_

\_\_\_\_\_  
THE HONORABLE VALERIE FIGUEREDO  
UNITED STATES MAGISTRATE JUDGE

Dated: April 14, 2025

Respectfully submitted,

/s/ Laurence Rosen

Phillip Kim

Laurence Rosen

The Rosen Law Firm, P.A.

275 Madison Avenue, 40th Floor

New York, New York 10016

Tel: (212) 686-1060

Fax: (212) 202-3827

pkim@rosenlegal.com

lrosen@rosenlegal.com

*Lead Counsel for Lead Plaintiff and the Class*

/s/ Jonathan Rosenberg

Jonathan Rosenberg

Abby F. Rudzin

O'MELVENY & MYERS LLP

1301 Avenue of the Americas

New York, NY 10019

Tel: (212) 326-2000

jrosenberg@omm.com

arudzin@omm.com

*Attorneys for Defendants Goldman Sachs  
(Asia) L.L.C.; Morgan Stanley & Co. LLC;  
J.P. Morgan Securities LLC; BofA Securities,  
Inc.; Barclays Capital Inc.; Citigroup Global  
Markets Inc.; HSBC Securities (USA) Inc.;  
UBS Securities LLC; and Mizuho Securities  
USA LLC; and China Renaissance Securities  
(US) Inc.*